



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

June 22, 2009

Ms Carrie McEnteer, Environmental Planning Branch Chief
US Army Garrison Alaska, Fort Wainwright
Directorate of Public Works
Attn: IMPC-FWA-PWE (McEnteer)
1060 Gaffney Road #4500
Fort Wainwright, AK 99703-4500

Subject: Stationing and Training of Increased Aviation Assets, U.S. Army AK
EPA Project Number: 07-015-DOD

Dear Ms. McEnteer:

The U.S. Environmental Protection Agency (EPA) has reviewed the U.S. Department of the Army (Army) **Draft Environmental Impact Statement (DEIS) for the Stationing and Training of Increased Aviation Assets within U.S. Army Alaska** (CEQ No. 20090136). Our review of the DEIS was conducted in accordance with our responsibilities under National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309 specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions.

The DEIS was prepared to evaluate the Army proposal to station increased aviation assets in Alaska through the creation of a new unit with increased capacity. This would involve the stationing of additional Soldiers and helicopters, constructing a number of facilities at Fort Wainwright and increasing aviation training on Army lands and within airspace in Alaska. Two action alternatives have been developed by the Army to address this proposal. Although not identified as such in the DEIS, the Army identified Alternative 2-Aviation Task Force as its Preferred Alternative in the May 1, 2009, Notice of Availability published in the *Federal Register*. EPA has based its review and rating on Alternative 2. We note that identifying the Preferred Alternative in the DEIS aids public and agency review.

We commend the Army's efforts to engage potentially impacted tribal governments and communities through its extensive consultation and public outreach activities. We also appreciate and support the use of valued environmental components for resource impact evaluation. We believe this approach makes sense and is appropriate given the resources that are included as such in the analysis. Finally, we support the Army's selection of Alternative 2 as its Preferred Alternative as it avoids potential impacts to sensitive resources in and around Fort Richardson and Elmendorf AFB, as well as minimizes impacts to air and water quality when compared to Alternative 3.

We do have concerns regarding potential impacts to air quality, water quality, and historic resources, as well as potential conflicts with general aviation, however. We believe that additional analysis is needed to adequately evaluate impacts to air and water quality, and to clearly demonstrate conformity and to ensure that further degradation of an impaired water body (Chena River) will not occur. In addition, we believe that further information is needed to adequately discuss impacts to historic properties. We also believe that further information should be included in the FEIS regarding specific mitigation to ensure safety for general and Army aviation users. Currently, although impacts to general aviation are mentioned there is insufficient information on which to base the conclusion of minor impacts. Finally, we are concerned with construction and other activities in areas with both known and unidentified contamination. We do, however, appreciate the Army's recognition of the potential hazards encountered in such areas, and its reaffirmation of commitment to existing Federal Facility Agreements, CERCLA Records of Decisions (RODs) and Institutional Controls (ICs). In general, we support any measures that will avoid or minimize disturbance of these areas, as well as direct and indirect impacts to air and water quality, and other resources.

Based on our review, we have rated the Preferred Alternative EC-2 (Environmental Concerns, Insufficient Information). This rating and a summary of our comments will be published in the *Federal Register*. A summary of the rating system we used in conducting our review of the Draft EIS is enclosed for your reference.

We appreciate the opportunity to provide comments on the Army Aviation Assets Reorganization DEIS. If you have any questions regarding our comments, please Jennifer Curtis of my staff at 907-271-6324 or curtis.jennifer@epa.gov.

Sincerely,

/s/

Christine B. Reichgott, Manager
Environmental Review and
Sediments Management Unit

EPA DETAILED COMMENTS ON THE ARMY AVIATION ASSETS REORGANIZATION DRAFT ENVIRONMENTAL IMPACT STATEMENT

Air Quality and General Conformity

There is a modified version of MOBILE6 that was prepared for Fairbanks (see 67 FR 5067). EPA recommends use of this model in future evaluations because it is the regulatory model for CO in Fairbanks.

Although the assumptions used in the General Conformity and air emissions analyses appear appropriate, we do have concerns regarding the lack of clarity concerning indirect emissions for Eielson AFB. The General Conformity Analysis (Appendix D) for the Fairbanks area does not include the indirect emissions from Eielson AFB, which were discussed in the air quality analysis in Chapter 4 (Table 4.7.g). In conducting an applicability analysis, the Federal agency must determine whether the total direct and indirect emissions from the action are below or above the de minimis levels (see 71 FR 40420). We recommend further evaluation of the emissions calculations because if the indirect emissions from Eielson AFB (61.1 tons/year) were added to the table for Fairbanks area emissions (see table in Conclusions, Appendix D), the CO de minimis threshold of 100 tons/year would be exceeded. It is also not clear why the project would create much higher CO emissions at Eielson AFB compared to the other sites. We recommend further review and explanation regarding that level of emissions.

Also, while indirect emissions for Fort Richardson in the Anchorage area were included in the calculation, there are different emissions shown for helicopter activity between Appendix D and Chapter 4. Appendix D shows 1.3 tons/year CO emissions (see table on p. D-5) and Chapter 4 shows 5.55 tons/year CO emissions (see Table 4.7.j, p. 4-113). We recommend that this discrepancy be clarified and this information be included in the final EIS.

Finally, we recommend that the final EIS identify areas where CO emissions from vehicles and parking (29.3 tons and 21.0 tons) are being created to adequately evaluate problem intersections, for example identifying if the level of service is decreasing at any affected intersection. Once these affected locations are identified, appropriate mitigation should be considered. We recommend this information be included in the final EIS.

Water Quality

We believe that the DEIS does not fully consider impacts from stormwater runoff to the Chena River. As a 303(d) listed water body, and the main receiving body for runoff from Wainwright, EPA believes it is necessary for an evaluation of such impacts to be included in the FEIS. The additional roads and structures proposed for construction under the Alternative 2 will create additional impervious surface (in areas not previously hardened with concrete), which should also be taken into account in your analysis. EPA believes that short-term (construction) and long-term (operations) impacts should both be evaluated, and a clear determination of compliance with the antidegradation requirements should be provided. If the Army cannot demonstrate compliance with the antidegradation requirements, additional mitigation should be included to prevent or minimize impacts that could cause degradation. We recommend that the Army work with the Water Quality Division of the Alaska Department of Environmental Conservation and EPA Region 10 Stormwater Program to determine what additional measures, if

any, should be taken to minimize impacts to the Chena, and to incorporate any proposed Total Maximum Daily Limit (TMDL) restrictions currently under development. We recommend that this information be included in the final EIS.

Historic Properties and Resources

The DEIS clearly identifies significant impacts to historic properties on Fort Wainwright. We are pleased that the Army is working closely with the Fairbanks North Star Borough Historic Preservation Commission and the State Historic Preservation Office (SHPO) on these issues. We recommend that any specific concerns identified in the NHPA 106 consultation process or in on-going communication with the SHPO, and ultimately any additional mitigation commitments, be included in the final EIS. Also, if any archeological remains or cultural resources are identified during work to identify such remains and resources, we strongly recommend that the Army notify appropriate tribal governments immediately and work with them closely to ensure proper handling and disposition.

Contaminated Sites

The DEIS also identifies known contaminated sites for which appropriate FFAs, RODs and ICs have been developed with the appropriate federal (EPA) and state (ADEC) agencies. The Army has made it clear that any changes to those decisions or agreements would necessitate further negotiation with EPA and ADEC to revise those agreements. We appreciate the acknowledgement of the possible need to revise agreements. We believe, however, that the final EIS should evaluate such potential scenarios involving needed changes to ICs and disclose any potential impacts associated with those changes. We also believe that commitments to on-going monitoring in areas where the presence of contamination is possible, but has not been identified previously, should be identified in the final EIS.

General Comments

On several occasions, the DEIS states that the "study area" includes "all military locations" in Alaska. As several military sites were not included in the analysis, we recommend that these statements be changed to accurately reflect the actual study area used.

Page 8-4 Tanacross is misspelled.

Page 8-2 Under EPA, contact information for Jacques Gusmano is incorrect. He is located in the EPA Alaska Operations Office in Anchorage.